

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE NATIONAL ASSOCIATION FOR  
THE ADVANCEMENT OF COLORED  
PEOPLE SPRING VALLEY BRANCH;  
JULIO CLERVEAUX; CHEVON DOS  
REIS; ERIC GOODWIN; JOSE VITELIO  
GREGORIO; DOROTHY MILLER;  
HILLARY MOREAU; and WASHINGTON  
SANCHEZ,

Plaintiffs,

v.

EAST RAMAPO CENTRAL SCHOOL  
DISTRICT,

Defendants.

Case No: 7:17 Civ 08943(CS)(JCM)

---

**DECLARATION OF CLAUDIA T. SALOMON**

---

CLAUDIA T. SALOMON, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

1. I am a Partner of the law firm of Latham & Watkins, LLP, 885 Third Avenue, New York, NY 10022, co-counsel for Plaintiffs with New York Civil Liberties Union Foundation in the above-captioned matter. I am a member in good standing of the bar of the State of New York and this Court.
2. I respectfully submit this declaration in support of Plaintiffs' Rule 72(a) Objection to, and Motion to Reconsider, Magistrate Judge's December 3, 2018 Order Granting Defendant's Motion to Quash Subpoenas Directed to David Butler. I am familiar with all of the facts and circumstances set forth herein.

3. Attached as Exhibit 1 is a true and correct copy of the document produced in this litigation as ERCSD\_GROSSMAN\_00000490.

4. Attached as Exhibit 2 is a true and correct copy of the Notice of Non-Party Subpoena *Duces Tecum* served upon David Butler.

5. Attached as Exhibit 3 is a true and correct copy of the transcript of the December 3, 2018 hearing in front of the Hon. Judith C. McCarthy, Magistrate Judge.

6. Attached as Exhibit 4 is a true and correct copy of the document produced in this litigation as ERCSD\_GROSSMAN\_00000742.

7. Attached as Exhibit 5 is an excerpt of a true and correct copy of the document produced in this litigation as ERCSD\_BoE\_00000231.

8. Attached as Exhibit 6 is a true and correct copy of the Notice of Non-Party Subpoena *Ad Testificandum* served upon David Butler.

Dated: New York, New York  
December 17, 2018

/s/ Claudia Salomon  
\_\_\_\_\_  
Claudia Salomon